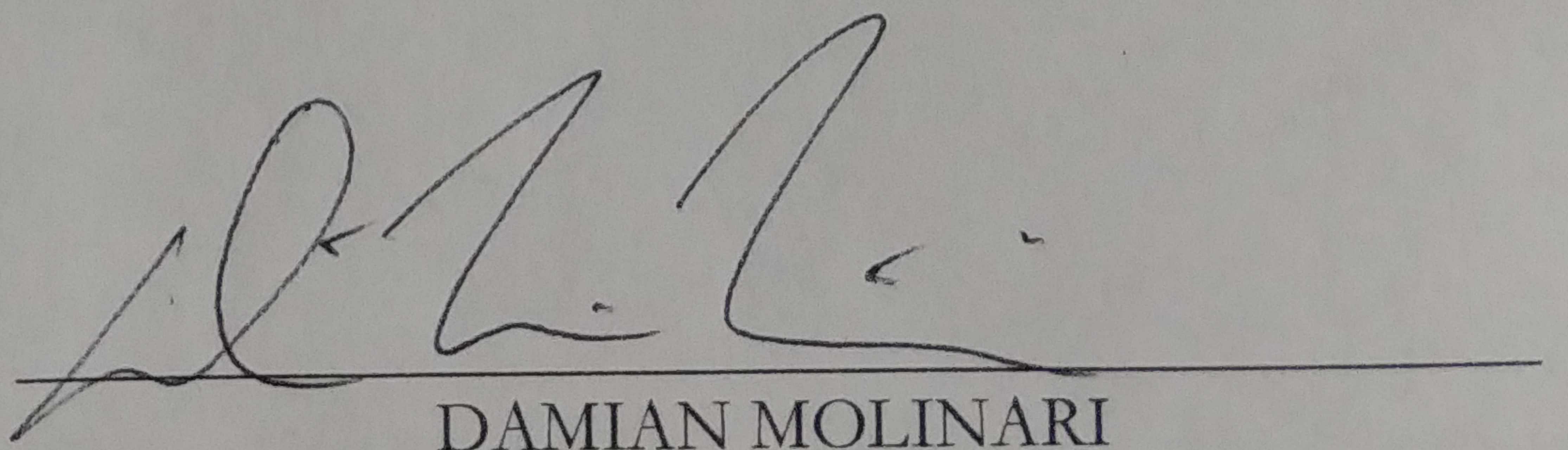# Exhibit "B"

DECLARATION OF DAMIAN MOLINARI

I, Damian Molinari, declare:

My telephone number is (415) 297-2945; my email is damianmolinari@gmail.com. On June 15, 2018, I was pulling up to my house at 121 Farnum St., in San Francisco, CA when I saw a woman lying on the sidewalk, bleeding. Another gentleman was attending to her. I walked over to see if I could help and I noticed that she was bleeding from a couple of places around her eyes. I learned that the woman on the ground was Louise Wiltz.

Some months before this incident I remember that utility workers were doing a job on the street in front of my house. They had a backhoe (or similar heavy equipment) digging up the street. I am not sure it they were working on water or sewer pipes, but both services are provided by the City and County of San Francisco. The backhoe was positioned so that one of the outrigger legs was directly on top of one of the utility boxes in the sidewalk in front of my house. Prior to the work being done, the utility box had been flush with the sidewalk. After the backhoe leg had been placed on the utility box, the box was pushed down below the level of the sidewalk. Towards the end of the job I remember pointing out the utility box cover to one of the utility workers in the area. I explained that it was a tripping hazard. The employee told me that he would mention it to his supervisor. The tripping hazard was never fixed. Months later, I came home to find that Ms. Wiltz had tripped over the same utility box tripping hazard that I had pointed out to the City worker.

I declare under penalty of perjury, under the laws of the State of California that the foregoing is true and correct, except as to those statements made on information and belief, and as to those statements, I believe them to be true. Executed at San Francisco, California on July 15, 2020.

_____
DAMIAN MOLINARI